

REMARKS

Rejection of Claims 1-12 under 35 U.S.C. § 103 (a) as being unpatentable over US 2002/0068584 (Gage) in view of US 2002/0069278 (Forslow)

Applicant respectfully traverses the rejection of claims 1-12. Reconsideration is respectfully requested.

The Office Action on page 3 states “Gage clearly discloses a system comprising at least a first device (wireless device), a second device (network edge router)...; injecting an updated route to the anycast address into the routing infrastructure each time the first device moves to a different subnet (paragraph 63, lines 1-14; paragraph 84, lines 1-19); sending a binding update to the second device informing the second device of the anycast address (paragraph 63, lines 1-14; paragraph 84, lines 1-19)... Except: Roaming to a different subnet. In the field of endeavor Forslow clearly discloses roaming to a different subnet (paragraph 27, lines 17-37; paragraph 100, lines 13-16).”

Applicant respectfully submits that the combination of Gage and Forslow does not teach or suggest all the claim limitations as set forth in independent claim 1. Specifically, independent claim 1 requires “injecting an updated route to the anycast address into the routing infrastructure each time the first device moves to a different subnet” and “sending a binding update to the second device informing the second device of the anycast address” which are not taught or suggested in the combination of Gage and Forslow.

Gage is directed to a mobile device 26 providing its location data to network edge routers 12. In one embodiment, mobile device 26 accomplishes this by sending routing domain location data to a location updating unit 30, which distributes the location data to network edge routers 12. Further, Gage describes that in the case of multiple location updating units 30, wireless device 26 can use an anycast address to deliver the location data to the location updating unit 30 closest to the radio edge router 14 which receives the location data packet. See Gage, FIG. 1 and page 7, paragraph [0084]. Thus, with regards to an implementation using an anycast address, Gage merely describes selecting a location updating unit 30 closest to the radio edge router 14 and delivering the location data to that selected location updating unit using the anycast address. There is no teaching in Gage of “injecting an updated route to the anycast address into the

routing infrastructure...” or “sending a binding update to the second device informing the second device of the anycast address” as required by Applicant’s independent claim 1.

Forslow is directed to a mobile virtual private network (VPN) providing a mobile client secure data access when the mobile client is moving in different subnetworks. See Forslow, page 4, paragraphs [0065] and [0066]. However, Forslow fails to describe “injecting an updated route to the anycast address into the routing infrastructure each time the first device moves to a different subnet” and “sending a binding update to the second device informing the second device of the anycast address” as required by independent claim 1.

The Office Action rejects Applicant’s independent Claim 1 by citing paragraphs [0063] and [0084] of Gage. Applicant has carefully reviewed this cited reference and cannot locate “injecting an updated route to the anycast address into the routing infrastructure...” and “sending a binding update to the second device informing the second device of the anycast address” as required by independent claim 1. Applicant respectfully submits that related to an anycast address, Gage at paragraphs [0063] and [0084] only describes “*Further, in the case of multiple location updating units 30, wireless device 26 can use an anycast address to deliver the location data to the location updating unit 30 closest to the radio edge router which receives the location data packet.*” As argued above, the quoted line does not describe limitations in Applicant’s independent claim 1. Applicant respectfully requests the examiner to provide exact citation (line numbers) showing “injecting an updated route to the anycast address into the routing infrastructure...” and “sending a binding update to the second device informing the second device of the anycast address” or withdraw the rejection.

In view of the foregoing, Applicant respectfully submits that the combination of Gage and Forslow does not teach or suggest the claim limitation of “injecting an updated route to the anycast address into the routing infrastructure each time the first device moves to a different subnet” and “sending a binding update to the second device informing the second device of the anycast address” as required by independent claim 1, so the Applicant respectfully requests withdrawal of the rejection of claim 1 under 35 U.S.C 103. Applicant requests that independent claim 1 now be passed to allowance.

Dependent claims 2-12 depend from, and include all the limitations of independent claim 1. Therefore, Applicant respectfully requests that claims 2-12 now be passed to allowance for the same reasons argued above with respect to independent claim 1.

Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact the Applicant's attorney or agent at the telephone number indicated below.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,

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